

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF PENNSYLVANIA**

KEYBANK NATIONAL ASSOCIATION,
a national banking association, successor
by merger to First Niagara Bank, N.A.,

Plaintiff,

v.

T.J.V. HOLDINGS, LLC; VELTRI
ELECTRIC, INC.; JOHN A. VELTRI, JR.;
and TAMI J. VELTRI,

Defendants.

Civil Action No. 2:21-CV-01337-NBF

**AFFIRMATION IN SUPPORT OF
REQUEST FOR CLERK'S
CERTIFICATE OF DEFAULT AS TO
DEFENDANTS T.J.V. HOLDINGS,
LLC; VELTRI ELECTRIC, INC.,
JOHN A. VELTRI, JR.; AND TAMI J.
VELTRI**

I, Dafney Dubuisson Stokes, hereby declare as follows:

1. I am counsel for Plaintiff KeyBank National Association, a national banking association, successor by merger to First Niagara Bank, N.A., in this action.
2. This action was commenced pursuant to 28 U.S.C. § 1332 by way of Complaint filed on October 6, 2021.
3. The time for Defendants T.J.V. Holdings, LLC, Veltri Electric, Inc., John A. Veltri, Jr., and Tami J. Veltri, to answer or otherwise move with respect to the Complaint has elapsed, and the time for Defendants T.J.V. Holdings, LLC, Veltri Electric, Inc., John A. Veltri, Jr., and Tami J. Veltri, to answer or otherwise move has not been extended.
4. Defendants T.J.V. Holdings, LLC and Veltri Electric, Inc. are active corporations organized under the laws of the Commonwealth of Pennsylvania.
5. Defendant John A. Veltri, Jr. is not an infant or incompetent, nor is he presently in the military service of the United States as appears from facts in this litigation.

6. Defendant Tami J. Veltri is not an infant or incompetent, nor is she presently in the military service of the United States as appears from facts in this litigation.

7. Defendants T.J.V. Holdings, LLC, Veltri Electric, Inc., John A. Veltri, Jr., and Tami J. Veltri, are indebted, jointly and severally, to Plaintiff, as set forth in the Complaint.

WHEREFORE, Plaintiff KeyBank National Association requests that the default of Defendants T.J.V. Holdings, LLC, Veltri Electric, Inc., John A. Veltri, Jr., and Tami J. Veltri, be noted and a certificate of default issued as to each.

I declare under penalty of perjury that the foregoing is true and accurate to the best of my knowledge, information and belief, that the amount claimed is justly due to Plaintiff, and that no part thereof has been paid.

Date: January 24, 2022

WONG FLEMING

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